

FILED  
CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2022 APR 13 PM 3:37

(Del. Rev. 5/2014) Pro Se Employment Discrimination Complaint

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Da Zhang

(Name of Plaintiff or Plaintiffs)

v.

Civ. Action No. 22 - 477  
(To be assigned by Clerk's Office)

Bank of America

Deerfield Susan Surengil

(Name of Defendant or Defendants)

COMPLAINT FOR  
EMPLOYMENT DISCRIMINATION  
(Pro se)

Jury Demand?

☒ Yes  
☐ No

*I would probably want a jury trial.*

1. This action is brought pursuant to (check all spaces that apply):

- ☒ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*, for employment discrimination on the basis of race, color, religion, sex, or national origin.
- ☐ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et seq.*, for employment discrimination on the basis of age. My year of birth is: \_\_\_\_\_.
- ☐ Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.
- ☐ Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.

2. Plaintiff resides at

4 Exeter PL

(Street Address)

Newark

(City)

New Castle DE

(County)

(State)

19711

(Zip Code)

2989

(Area Code) (Phone Number)

302-668-7852

Attach additional sheets if more than one Plaintiff.

3. Defendant resides at, or its business is located at

655 Paper Mill Rd

(Street Address)

Newark

(City)

New Castle

(County)

DE

(State)

19711

(Zip Code)

Attach additional sheets if more than one Defendant.

4. The discriminatory conduct occurred in connection with plaintiff's employment at, or application to be employed at, defendant's Bank of America place of business

located at 655 Paper Mill Rd (Street Address)  
Newark (City) New Castle (County) DE (State) 19711 (Zip Code).

5. The alleged discriminatory acts occurred on consecutive 2 years for a couple of times.  
 (Day) (Month) (Year)

6. The alleged discriminatory practice ☒ is ☐ is not continuing. for around two years from 2019 ~ 2020

7 On \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, Plaintiff filed charges  
 (Day) (Month) (Year)

with the Department of Labor of the State of Delaware: \_\_\_\_\_  
 (Agency)

\_\_\_\_\_  
 (Street Address) (City) (County)  
 \_\_\_\_\_, regarding defendant's alleged discriminatory conduct.  
 (State) (Zip Code)

8. On 7th, June, 2021, Plaintiff filed charges  
 (Day) (Month) (Year)  
 with the Equal Employment Opportunity Commission of the United States regarding defendant's alleged discriminatory conduct.

9. The Equal Employment Opportunity Commission issued the attached Notice-of-Right-to-Sue letter which was received by plaintiff on: 11, April, 2022.  
 (Day) (Month) (Year)

**(NOTE: ATTACH NOTICE-OF-RIGHT-TO-SUE LETTER TO THIS COMPLAINT.)**

10. The alleged discriminatory acts, in this suit, concern:

- A. ☐ Failure to employ plaintiff.  
 B. ☒ Termination of plaintiff's employment. Plaintiff was terminated from employment on the following date: Dec 2, 2020.  
 C. ☐ Failure to promote plaintiff. Plaintiff was refused a promotion on the following date: \_\_\_\_\_.  
 D. ☐ Other acts (please specify): \_\_\_\_\_

① unfair treatment because of national origin

② Retaliation

③ Bully

11. The conduct of Defendant(s) was discriminatory because it was based on (check all that apply):



- A. ☐ Plaintiff's race
- B. ☐ Plaintiff's color
- C. ☐ Plaintiff's sex
- D. ☐ Plaintiff's religion
- E. ☒ Plaintiff's national origin
- F. ☐ Plaintiff's age
- G. ☐ Plaintiff's disability

12. A copy of the charges filed with the Department of Labor of the State of Delaware and/or the Equal Employment Opportunity Commission is attached to this complaint and is submitted as a brief statement of the facts of plaintiff's claim.

**(NOTE: ATTACH A COPY OF THE CHARGES FILED WITH THE DEPARTMENT OF LABOR OF THE STATE OF DELAWARE AND/OR THE EQUAL EMPLOYMENT OPPORTUNITY COMMISSION OF THE UNITED STATES TO THIS COMPLAINT.)**

THEREFORE, Plaintiff asks the Court to grant such relief as may be appropriate, including but not limited to (check all that apply):

- A. ☒ Injunctive relief (specify what you want the Court to order): \$52 million compensation paid to me for years' sufferings psychologically, emotionally, spiritually since 2019.
- B. ☒ Back pay.
- C. ☒ Reinstatement to former position.
- D. ☒ Monetary damages in the amount of \$52 million.
- E. ☒ That the Court appoint legal counsel.
- F. ☒ Such relief as may be appropriate, including costs and attorney's fees.
- G. ☒ Other (specify): Official apology and appreciation from BOA.

I/We declare under penalty of perjury that the foregoing is true and correct.

Dated: April 12, 2022

*Da Zhang*  
(Signature of Plaintiff)

\_\_\_\_\_  
(Signature of additional Plaintiff)

**NOTICE**

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.